

RUSSELL S. ROECA (State Bar #97297)
KYLE MONTES DE OCA (State Bar #280114)
ROECA HAAS HAGER LLP
250 Montgomery St., Suite 1410
San Francisco, CA 94104
Telephone: (415) 352-0980
Facsimile: (415) 352-0988
Email: rroeca@r2hlaw.com, kmontesdeoca@r2hlaw.com

Attorneys for Counter-Defendant
DELFINO, GREEN & GREEN, a law firm

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DELFINO, GREEN & GREEN, a law firm,

Plaintiff,

v.

WORKERS COMPENSATION
SOLUTIONS, LLC, a Delaware limited
liability company, and DOES ONE through
TWENTY,

Defendants.

WORKERS COMPENSATION
SOLUTIONS, LLC, a Delaware limited
liability company,

Counter-Claimant,

v.

DELFINO, GREEN & GREEN, a law firm,

Counter-Defendant.

Case No. 3:15-cv-02302-HSG

**STIPULATION AND ORDER RE:
DISMISSAL OF FIRST THREE CAUSES
OF ACTION IN WORKERS
COMPENSATION SOLUTIONS, LLC'S
COUNTER-COMPLAINT**

Action Filed: March 26, 2015

STIPULATION

Counter-Defendant Delfino, Green & Green (“DGG”) and Counter-Claimant Workers Compensation Solutions, LLC (“WCS”), by and through their respective counsel and in accordance with their agreement at the hearing on DGG’s motion to dismiss, heard on September 3, 2015, before Judge Haywood S. Gilliam, Jr. in Courtroom 15, of the United States District Court for the Northern District of California, hereby stipulate that WCS’ first three causes of action for Declaratory Relief as alleged in its counter-claim filed on or about May 28, 2015, be dismissed in their entirety. The dismissal of the first three causes of action shall not affect the affirmative defenses asserted in WCS’ Answer, filed on or about May 28, 2015.

IT IS SO STIPULATED.

Dated: September 11, 2015

ROECA HAAS HAGER LLP

By: /s/ Kyle Montes De Oca

Russell S. Roeca

Kyle Montes De Oca

Attorneys for Counter-Defendant

DELFINO, GREEN & GREEN, a law firm

Dated: September 11, 2015

BROWNSTEIN HYATT FARBER SCHRECK LLP

By: /s/ Arthur A. Zorio

Arthur A. Zorio

Attorneys for Defendant and Counter-Claimant

WORKERS COMPENSATION SOLUTIONS,
LLC

ORDER

The Court, after having reviewed the stipulation of the parties, and finding good cause, hereby ORDERS:

1. Defendant and Counter-Claimant Workers Compensation Solutions, LLC's first cause of action for "Declaratory Relief: Attorney Fee Agreement – Void" as alleged in its counterclaim is hereby **DISMISSED**.

2. Defendant and Counter-Claimant Workers Compensation Solutions, LLC's second cause of action for "Declaratory Relief: Attorney Fee Agreement Does not Provide for Interest" as alleged in its counterclaim is hereby **DISMISSED**.

3. Defendant and Counter-Claimant Workers Compensation Solutions, LLC's third cause of action for "Declaratory Relief: Attorney Fee Agreement Does not Provide Recovery on Reimbursed Fees or Costs" as alleged in its counterclaim is hereby **DISMISSED**.

IT IS SO ORDERED.

Dated: _____

HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE